

**JENNIFER BERGH**  
Nevada Bar No. 14480  
**QUILLING SELANDER LOWNDS**  
**WINSLETT & MOSER, P.C.**  
6900 N. Dallas Parkway, Suite 800  
Plano, Texas 75024  
Telephone: (214) 560-5460  
Facsimile: (214) 871-2111  
[jbergh@qslwm.com](mailto:jbergh@qslwm.com)

COUNSEL FOR TRANS UNION LLC

**\*\*Designated Attorney for Personal Service\*\***

Trevor Waite, Esq.  
Nevada Bar No.: 13779  
6605 Grand Montecito Parkway, Suite 200  
Las Vegas, Nevada 89149

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

ADRIANA CARCELEN,

Plaintiff,

V.

CITIBANK, N.A., SYNCHRONY BANK,  
EQUIFAX INFORMATION SERVICES LLC,  
EXPERIAN INFORMATION SOLUTIONS, INC.,  
and TRANS UNION LLC,

### Defendants.

Case No. 2:19-cv-01533-APG-VCF

**JOINT STIPULATION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC'S TIME TO FILE AN  
ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT  
(FIRST REQUEST)**

Plaintiff Adriana Carcelen (“Plaintiff”), and Defendant Trans Union LLC (“Trans Union”), by and through their respective counsel, file this Joint Stipulation Extending Defendant Trans Union’s Time to Respond to Plaintiff’s Complaint.

On September 3, 2019, Plaintiff filed her Complaint. On September 10, 2019, Trans Union was served with Plaintiff's Complaint. The current deadline for Trans Union to answer or otherwise respond to Plaintiff's Complaint is October 1, 2019.

1 Trans Union requires additional time to investigate, locate and assemble documents  
2 relating to Plaintiff's claims. In addition, Trans Union's counsel will need additional time to  
3 review the documents and respond to the allegations in Plaintiff's Complaint.

4 Plaintiff has agreed to extend the deadline in which Trans Union has to answer or  
5 otherwise respond to Plaintiff's Complaint up to and including October 22, 2019. This is the  
6 first stipulation for extension of time for Trans Union to respond to Plaintiff's Complaint.

7 Dated this 30th day of September 2019.  
8

9 **QUILLING SELANDER LOWNDS  
WINSLETT & MOSER, P.C.**

10 /s/ Jennifer Bergh  
11 Jennifer Bergh  
12 Nevada Bar No. 14480  
13 6900 N. Dallas Parkway, Suite 800  
14 Plano, Texas 75024  
15 Telephone: (214) 560-5460  
Facsimile: (214) 871-2111  
[jbergh@qslwm.com](mailto:jbergh@qslwm.com)  
Counsel for Trans Union LLC

16  
17 **LAW OFFICE OF KEVIN L. HERNANDEZ**

18 /s/ Kevin L. Hernandez  
19 Kevin L. Hernandez  
20 Nevada Bar No. 12594  
21 8872 S. Eastern Avenue, Suite 270  
22 Las Vegas, Nevada 89123  
Telephone: (702) 563-4450  
Facsimile: (702) 552-0408  
[kevin@kevinhernandezlaw.com](mailto:kevin@kevinhernandezlaw.com)  
Counsel for Plaintiff

## ORDER

The Joint Stipulation for Extension of Time for Trans Union LLC to file an answer or otherwise respond is so ORDERED AND ADJUDGED.

Dated this 30th day of September, 2019.

*Carl Radcliffe*

---

**UNITED STATES MAGISTRATE JUDGE**